
THOMPSON BURTON PLLC

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October 29, 2021

Craig Gabbert
Bass, Berry & Sims PLC
150 Third Ave. South, Suite 2800
Nashville, TN 37201
cgabbert@bassberry.com

Re: *Burton v. Hagh Law PLLC et al.*
United States Bankruptcy Court for the Middle District of Tennessee
Case No. 3:20-ap-90002

Dear Craig:

As you know, this firm represents Jeanne Ann Burton, Chapter 7 Trustee and Plaintiff in the above-referenced matter. I am sending this letter pursuant to Rule 37 of the Federal Rule of Civil Procedures as a good faith attempt to resolve discovery disputes prior to the filing of a motion to compel.

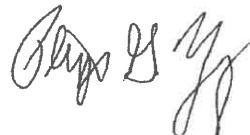
On or about January 28, 2021, you sent me Defendant Hagh Law, PLLC's Response to Plaintiff's First Request for Production of Documents ("Hagh Law Request for Production Responses") and Defendant Hagh Law, PLLC's Response to Plaintiff's First Set of Interrogatories ("Hagh Law Interrogatory Responses") (collectively, "Hagh Law Discovery Responses"). You also sent me Defendant Afsoon Hagh's Response to Plaintiff's First Request for Production of Documents ("Afsoon Request for Production Responses") and Defendant Afsoon Hagh's Response to Plaintiff's First Set of Interrogatories ("Afsoon Interrogatory Responses") (collectively, "Afsoon Discovery Responses"). I have had an opportunity to review the Hagh Law Discovery Responses and Afsoon Discovery Responses with the Trustee. Unfortunately, they are deficient in several important respects.

More specifically, Hagh Law, PLLC has failed to adequately respond to the following Interrogatories: Nos. 5 & 8. The Trustee is entitled to know what percentage fee, if any, that Hagh Law is seeking with regard to each case listed in Interrogatory No. 5 and the basis for any such claim. Additionally, Hagh Law's Request for Production Responses to the following Requests were deficient: 1, 3, 5, 7, 8 and 9. To the extent that Hagh Law, PLLC claims that any documents should be subject to a protective order, a proposed protective order is enclosed herewith.

Similarly, Afsoon Hagh's Request for Productions Responses to the following Requests were deficient: 1, 3, 5, 8 and 9. To the extent that Afsoon Hagh claims that any documents should be subject to a protective order, a proposed protective order is enclosed herewith.

By this letter, the Trustee requests that you more fully, completely and appropriately address these issues by no later than November 12, 2021. If you have failed to appropriately supplement your responses by that date, the Trustee will have no choice but to file a motion to compel responses with the Court.

Sincerely,



Phillip G. Young, Jr.

cc: Jeanne Ann Burton, Trustee